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Attorney for Debtor(s)

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

In re: Case No. 19-51427  
Chapter 13

MANZANARES, Efrain  
MANZANARES, Nora

**MOTION TO EXTEND AUTOMATIC  
STAY AS TO ALL CREDITORS**

**Debtor(s)**

**TO THE CHAPTER 13 TRUSTEE AND TO ALL CREDITORS OF EFRAIN  
MANZANARES AND NORA MANZANARES:**

**COME NOW the debtors herein, Efrain Manzanares and Nora Manzanares, who move this Honorable Court as follows:**

Relief requested: An order under section 362(c)(3)(B) of the Bankruptcy Code continuing in effect for the duration of this case, the Automatic Stay imposed under section 362(a) past the initial 30-day period prescribed by section 362(c)(3)(A). Said continuance of the Automatic Stay is requested as to all creditors. Said Order is necessary as the debtor had a previous Chapter 13 case pending within one year previous to the filing of the within case.

This motion is made on the grounds that the present Chapter 13 case was filed in good faith and that the continuance of the Automatic Stay is necessary to protect and preserve the bankruptcy estate and

1 that the continuance of the Automatic Stay is in the best interests of the debtors, creditors, and the  
2 bankruptcy estate.

3 This motion is based on the Notice of Hearing, the Points and Authorities, the Declaration of  
4 Debtors in Support of Motion, and on all of the schedules, statements, and documents on file in this  
5 case.

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7 Respectfully submitted,

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9 Dated: July 17, 2019

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11 /s/ Jason Vogelpohl  
12 JASON VOGELPOHL  
13 Attorney for Debtors  
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